

**GOVERNMENT OF PUERTO RICO
PUBLIC SERVICE REGULATORY BOARD
PUERTO RICO ENERGY BUREAU**

NEPR

Received:

Nov 15, 2025

7:17 PM

**IN RE: PUERTO RICO ELECTRIC
POWER AUTHORITY RATE REVIEW**

CASE NO.: NEPR-AP-2023-0003

**SUBJECT: Motion Submitting LUMA's
Objections to Documents Marked as
Exhibits by Energy Bureau Consultants
and Request for Brief Extension of Time**

**MOTION SUBMITTING LUMA'S OBJECTIONS TO DOCUMENTS MARKED AS
EXHIBITS BY ENERGY BUREAU CONSULTANTS AND REQUEST FOR BRIEF
EXTENSION OF TIME**

**TO THE HONORABLE PUERTO RICO ENERGY BUREAU, AND ITS HEARING
EXAMINER, SCOTT HEMPLING:**

COME NOW LUMA Energy, LLC ("ManagementCo"), and **LUMA Energy ServCo, LLC** ("ServCo") (jointly, "LUMA"), and respectfully state and request the following:

1. LUMA hereby files its objections to various documents marked by the Puerto Rico Energy Bureau ("Energy Bureau") consultants as exhibits in the Accion Discovery Platform. *See* Exhibit 1 to this Motion.

2. LUMA respectfully requests a brief extension until Tuesday, November 18, 2025, to finish its review of the Exhibits marked by the Energy Bureau consultants and inform if LUMA has additional objections.

WHEREFORE, LUMA respectfully requests that the Energy Bureau and its Hearing Examiner **take notice** of the aforementioned and **reject** the objected evidence for the reasons outlined in Exhibit 1 below.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of November, 2025.

WE HEREBY CERTIFY that this Motion was filed using was filed using the electronic filing system of this Energy Bureau and that electronic copies of this Notice will be notified to

Hearing Examiner, Scott Hempling, shempling@scotthemplinglaw.com; and to the attorneys of the parties of record. To wit, to the **Puerto Rico Electric Power Authority**, through: Mirelis Valle-Cancel, mvalle@gmlex.net; Juan González, jgonzalez@gmlex.net; Alexis G. Rivera Medina, arivera@gmlex.net; Juan Martínez, jmartinez@gmlex.net; and Natalia Zayas Godoy, nzayas@gmlex.net; and to **Genera PR, LLC**, through: Jorge Fernández-Reboredo, jfr@sbgbllaw.com; Giuliano Vilanova-Feliberti, gvilanova@vvlawpr.com; Maraliz Vázquez-Marrero, mvazquez@vvlawpr.com; ratecase@genera-pr.com; regulatory@genera-pr.com; and legal@genera-pr.com; **Co-counsel for Oficina Independiente de Protección al Consumidor**, hrivera@jrsp.pr.gov; contratistas@jrsp.pr.gov; pvazquez.oipc@avlawpr.com; **Co-counsel for Instituto de Competitividad y Sustentabilidad Económica**, jpouroman@outlook.com; agraitfe@agraitlawpr.com; **Co-counsel for National Public Finance Guarantee Corporation**, epo@amgprlaw.com; loliver@amgprlaw.com; acasellas@amgprlaw.com; matt.barr@weil.com; robert.berezin@weil.com; Gabriel.morgan@weil.com; Corey.Brady@weil.com; alexis.ramsey@weil.com; **Co-counsel for GoldenTree Asset Management LP**, lramos@ramoscruzlegal.com; tlauria@whitecase.com; gkurtz@whitecase.com; ccolumbres@whitecase.com; iglassman@whitecase.com; tmacwright@whitecase.com; jcunningham@whitecase.com; mshepherd@whitecase.com; jgreen@whitecase.com; **Co-counsel for Assured Guaranty, Inc.**, hburgos@cabprlaw.com; dperez@cabprlaw.com; mmcgill@gibsondunn.com; lshelfer@gibsondunn.com; howard.hawkins@cwt.com; mark.ellenberg@cwt.com; casey.servais@cwt.com; bill.natbony@cwt.com; thomas.curtin@cwt.com; **Co-counsel for Syncora Guarantee, Inc.**, escalera@reichardescalera.com; arizmendis@reichardescalera.com; riverac@reichardescalera.com; susheelkirpalani@quinnemanuel.com; erickay@quinnemanuel.com; **Co-Counsel for the PREPA Ad Hoc Group**, dmonserrate@msglawpr.com; fgierbolini@msglawpr.com; rschell@msglawpr.com; eric.brunstad@dechert.com; Stephen.zide@dechert.com; david.herman@dechert.com; michael.doluisio@dechert.com; stuart.steinberg@dechert.com; **Sistema de Retiro de los Empleados de la Autoridad de Energía Eléctrica**, nancy@emmanuelli.law; rafael.ortiz.mendoza@gmail.com; rolando@emmanuelli.law; monica@emmanuelli.law; cristian@emmanuelli.law; lgnq2021@gmail.com; **Official Committee of Unsecured Creditors of PREPA**, jcasillas@cstlawpr.com; jnieves@cstlawpr.com; **Solar and Energy Storage Association of Puerto Rico**, Cfl@mcvpr.com; apc@mcvpr.com; javrua@sesapr.org; mrrios@arroyorioslaw.com; ccordero@arroyorioslaw.com; **Wal-Mart Puerto Rico, Inc.**, Cfl@mcvpr.com; apc@mcvpr.com; **Solar United Neighbors**, ramonluisnieves@rlnlegal.com; **Mr. Victor González**, victorluisgonzalez@yahoo.com; and **the Energy Bureau's Consultants**, Josh.Llamas@fticonsulting.com; Anu.Sen@fticonsulting.com; Ellen.Smith@fticonsulting.com; Intisarul.Islam@weil.com; jorge@maxetaenergy.com; rafael@maxetaenergy.com; RSmithLA@aol.com; msdady@gmail.com; mcranston29@gmail.com; dawn.bisdorf@gmail.com; ahopkins@synapse-energy.com; clane@synapse-energy.com; guy@maxetaenergy.com; Julia@londoneconomics.com; Brian@londoneconomics.com; luke@londoneconomics.com; kbailey@acciongroup.com; hjudd@acciongroup.com; zachary.ming@ethree.com; PREBconsultants@acciongroup.com; carl.pechman@keylogic.com; bernard.neenan@keylogic.com; tara.hamilton@ethree.com; aryeh.goldparker@ethree.com; roger@maxetaenergy.com; Shadi@acciongroup.com; Gerard.Gil@ankura.com; Jorge.SanMiguel@ankura.com; Lucas.Porter@ankura.com; gerardo_cosme@solartekpr.net; jrinconlopez@guidhouse.com; kara.smith@weil.com; varoon.sachdev@whitecase.com;

zack.schrieber@cwt.com;
Kayla.Yoon@dechert.com;
ahopkins@synapse-energy.com.

Isaac.Stevens@dechert.com;
juan@londoneconomics.com;

James.Moser@dechert.com;
arrivera@nuenergypr.com;



DLA Piper (Puerto Rico) LLC
Calle de la Tanca #500, Suite 401
San Juan, PR 00901-1969
Tel. 787-945-9122 / 9103

/s/ Margarita Mercado Echegaray
Margarita Mercado Echegaray
RUA 16,266

Exhibit 1

**OBJECTIONS TO DOCUMENTS MARKED AS EXHIBITS BY THE ENERGY
BUREAU CONSULTANTS**

1. PC Exhibit No. 583 (partial objection)

- a. Description: LUMA's response to SESA-of-LUMA-DST-12.

LUMA's Objection:

LUMA objects to that portion of PC Exhibit No. 583 that includes a legal pleading whereby LUMA raised objections to several of SESA's requests for information. Those objections were resolved by the parties. LUMA's legal objections to a discovery request are not relevant and, thus, inadmissible. LUMA requests that the objections included with PC Exhibit No. 583 be stricken from the record.

2. PC Exhibit No. 586 (partial objection)

- a. Description: LUMA's response to SESA-of-LUMA-DST-13.

LUMA's Objection:

LUMA objects to that portion of PC Exhibit No. 586 that includes a legal pleading whereby LUMA raised objections to several of SESA's requests for information. Those objections were resolved by the parties. LUMA's legal objections to a discovery request are not relevant and, thus, inadmissible. LUMA requests that the objections included with PC Exhibit No. 586 be stricken from the record.

3. PC Exhibit No. 592 (partial objection)

- a. Description: LUMA's response to SESA-of-LUMA-DST-14

LUMA's Objection:

LUMA objects to that portion of PC Exhibit No. 592 that includes a legal pleading whereby LUMA raised objections to several of SESA's requests for information. Those objections were resolved by the parties. LUMA's legal objections to a discovery request are not relevant and, thus, inadmissible. LUMA requests that the objections included with PC Exhibit No. 592 be stricken from the record.